

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

UNITED STATES OF AMERICA	)	CR. NO. <u>6:14-571</u>
	)	18 U.S.C. § 371
vs.	)	18 U.S.C. § 1001(a)(2)
	)	
RONNIE GENE WILSON	)	
TIMOTHY L. WILSON	)	
CASSANDRA K. WILSON	)	<u>INDICTMENT</u>

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COUNT 1

THE GRAND JURY CHARGES:

1. That beginning in or about April 2012, and continuing up and to the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, RONNIE GENE WILSON, TIMOTHY L. WILSON and CASSANDRA K. WILSON, knowingly and willfully did combine, conspire, confederate, agree and have a tacit understanding with each other and with others known and unknown to the Grand Jury, to corruptly influence, obstruct and impede the due administration of justice in the investigation and prosecution of United States v. Ronnie Gene Wilson, et al., No. 8:12-320, and in the investigation and prosecution of In re Receiver for Ronnie Gene Wilson, et al., No. 8:12-2078, by the hiding and transferring of assets to prevent or impair the Government's lawful authority to take such property under its lawful custody and control, in violation of Title 18, United States Code, Sections 1503, 1512(c) & 2232(a).

### Manner and Means

2. It was part of the conspiracy that in an effort to maintain the benefit of certain property that otherwise would have been taken by the Government for the benefit of the victims of a Silver Ponzi Scheme, RONNIE GENE WILSON enlisted the assistance of TIMOTHY L. WILSON and CASSANDRA K. WILSON.

3. RONNIE GENE WILSON then transferred property to TIMOTHY L. WILSON and CASSANDRA K. WILSON.

4. TIMOTHY L. WILSON and CASSANDRA K. WILSON accepted such property and actively hid the property from the United States.

### Overt Acts

5. In furtherance of the conspiracy and to effect the objects thereof, the following overt acts, among others, were committed in the District of South Carolina and elsewhere:

a. In and around April 2012, RONNIE GENE WILSON gave TIMOTHY L. WILSON an ammunition canister containing United States currency.

b. In and around May 2012, TIMOTHY L. WILSON hid an ammunition canister containing United States currency.

c. In and around the summer of 2012, RONNIE GENE WILSON gave CASSANDRA K. WILSON an ammunition canister containing United States currency.

d. On February 26, 2014, CASSANDRA K. WILSON during a deposition concealed from counsel for the Federal Receiver her possession of the ammunition canister containing federal currency.

All in violation of Title 18, United States Code, Section 371.

## COUNT 2

### THE GRAND JURY FURTHER CHARGES:

On or about September 20, 2012, in the District of South Carolina, in a matter within the jurisdiction of the executive branch of the government of the United States, RONNIE GENE WILSON, did knowingly and willfully make a false, fraudulent and fictitious material statement and representation knowing the same to be false, that is RONNIE GENE WILSON made false statements to an agent of the United States Secret Service that he had not hidden or transferred assets when, in fact, he well knew that he had secreted assets with family members.

All in violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE Bill

redacted

FOREPERSON

  
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WILLIAM N. NETTLES (WJW)  
UNITED STATES ATTORNEY